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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SALOOJAS, INC.,

Plaintiff,

v.

BLUE SHIELD OF CALIFORNIA LIFE &
HEALTH INSURANCE COMPANY

Defendant.

Case No.: 3:22-cv-03267-MMC
Hon. Maxine M. Chesney

**STIPULATION TO SEAL DOCKET 1
UNDER HIPAA**

Complaint Filed: June 3, 2022

Pursuant to Civil Local Rule 6-1(a), Plaintiff Saloojas, Inc (“Saloojas”) and Defendant BLUE SHIELD OF CALIFORNIA LIFE & HEALTH INSURANCE COMPANY (“Blue Shield”) by and through their respective counsel of record, stipulate as follows:

WHEREAS, Plaintiff served its Complaint on June 3, 2022;

WHEREAS, After service it was discovered that the exhibits on pages 20 through 24 of the complaint contained the names and member identification numbers of five patients whose Protected Health Information was required to be redacted pursuant to the Federal HIPAA law. The names had been manually crossed out but on the original complaint before conversion to PDF form for filing

WHEREAS after service of the Complaint Defendant discovered that the names could be read through thru the crossing out and so notified Plaintiff

WHEREAS Plaintiff upon being notified that the names and member identification numbers were readable, immediately filed a Corrected Copy of the Complaint as Docket 14 wherein the names were whited out along with Member Identification numbers and further corrected was the reported total number of the pages from 37 to 38 and made no other changes to the Corrected Copy

WHEREAS the docketing clerk notified Plaintiff that although the Corrected Copy is filed an order is still needed to seal DOCKET 1 so that the Protected Health Information protected under HIPAA cannot be accessed

WHEREAS, Plaintiff has requested, and Defendant has consented to stipulate, in lieu of making a motion to seal to Docket 1, that Docket 1 can be sealed

NOW, THEREFORE, IT IS HEREBY STIPULATED pursuant to Civil Local Rule 6-1(a), by and between the Parties, through their respective counsel, that Docket 1 filed in the action can be sealed

IT IS SO STIPULATED.

DATED: July 18, 2022

MANATT, PHELPS & PHILLIPS, LLP

By: /s / Justin Jones Rodriguez
JUSTIN JONES RODRIGUEZ

DATED: July 18, 2022

**LAW OFFICE OF MICHAEL LYNN
GABRIEL**

By: / s / Michael Lynn Gabriel
MICHAEL LYNN GABRIEL

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2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
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6 DATED: _____, 2022
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9 _____
10 UNITED STATES DISTRICT JUDGE
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13 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)**
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16 Pursuant to Civil Local Rule 5-1(h)(3), the filer of this document attests that concurrence in
17 the filing of this document has been obtained from the signatories above.
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20 DATED: July 18, 2022
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23 _____
24 */s/ MICHAEL LYNN GABRIEL*
25 MICHAEL LYNN GABRIEL
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